

1 LISA A. RASMUSSEN, ESQ.  
2 NV Bar 7491  
3 RICHARD BRYANT, ESQ.  
4 NV Bar 15511  
**THE LAW OFFICES OF**  
**KRISTINA WILDEVELD & ASSOCIATES**  
5 550 E. Charleston Blvd., Suite A  
6 Las Vegas, NV 89104  
7 Phone (702) 222-0007  
8 Lisa@Veldlaw.com  
9 Richard@Veldlaw.com,

10 *Attorneys for Plaintiff, Marc Galli*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 MARC GALLI,

14 Plaintiff,  
15 vs.  
16 ANTHONY RUSH, individually and in  
17 his official capacity; EDWARD PICKUP,  
18 individually and in his official capacity;  
HENDERSON FIRE DEPARTMENT, a  
municipal entity; MARISSA MEYERS,  
individually and in her official capacity;  
and JOSHUA FILSINGER, individually  
and in his official capacity;  
HENDERSON POLICE DEPARTMENT,  
a municipal entity; CITY OF  
HENDERSON, a municipal entity;

19 Defendants.

CASE NO. 2:22-cv-00023-APG-NJK

20 **STIPULATION TO EXTEND DEADLINE  
FOR PLAINTIFF TO RESPOND TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

21 **(FIRST REQUEST)**

22 COMES NOW the Plaintiff, MARC GALLI, by and through his counsel, Lisa A.  
23 Rasmussen, Esq., of the Law Offices of Kristina Wildeveld & Associates, and Defendants  
24 ANTHONY RUSH, EDWARD PICKUP, HENDERSON FIRE DEPARTMENT, MARISSA  
MEYERS, JOSHUA FILSINGER, HENDERSON POLICE DEPARTMENT, and CITY OF  
HENDERSON, by and through their counsel, Nicholas G. Vaskov, City Attorney for the City of

1 Henderson, and Brian R. Reeve, Assistant City Attorney for the City of Henderson, (collectively,  
2 the “Parties”), hereby stipulate pursuant to LR IA 6-1 and LR IA 6-2 to extend the time for  
3 Plaintiff to respond to Defendants’ Motion for Summary Judgment [ECF No. 23], filed on  
4 September 21, 2022, by twenty-one (21) days, to November 2, 2022. This is Plaintiff’s first  
5 request for such extension of time.

6 The Parties hereby stipulate and agree as follows:

7 **I. PROCEDURAL BACKGROUND**

8 1. Plaintiff’s Complaint was filed in the Eighth Judicial District Court on September  
9 23, 2021. It was removed to this Court on January 4, 2022. [ECF No. 1].

10 2. On January 11, 2022, Defendants filed their answer to Plaintiff’s complaint. [ECF  
11 No. 5.]

12 3. On February 11, 2022, the Parties’ stipulated discovery plan and scheduling order  
13 was approved, setting a dispositive motions deadline of August 10, 2022. [ECF No. 19.]

14 4. On July 13, 2022, the Parties’ stipulation and order to extend the dispositive  
15 motions deadline was approved, setting a dispositive motion deadline of September 21, 2022.  
16 [ECF No. 22.]

17 5. On September 21, 2022, Defendants filed their motion for summary judgment.  
18 [ECF No. 23.]

19 6. The response to Defendants’ motion for summary judgment is currently due on  
20 October 12, 2022. See LR 7-2(b).

21 7. Plaintiff’s counsel has experienced several pre-existing deadlines that have  
22 impeded her ability to respond to the Defendants’ motion, including a petition for writ of certiorari  
23 due in the United States Supreme Court, Case No. 22-5741, *Hylton v. United States*.

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1       **II. STIPULATION AND ORDER**

2              Based on the foregoing, the parties HEREBY STIPULATE that the time for Plaintiff to  
3 respond to Defendants' motion for summary judgment [ECF No. 23] shall be extended by twenty-  
4 one (21) days, from October 12, 2022, to November 2, 2022.

5              IT IS SO STIPULATED this 12th day of October, 2022.

6              **THE LAW OFFICES OF KRISTINA  
7 WILDEVELD & ASSOCIATES**

8              By: */s/ Lisa A. Rasmussen*  
9              LISA A. RASMUSSEN, Esq.  
10             Nevada Bar No. 7491  
11             550 E. Charleston Blvd., Ste. A  
12             Las Vegas, NV 89101  
13             Lisa@VeldLaw.com  
14             *Attorneys for Plaintiff*

6              **CITY OF HENDERSON**

7              By: */s/ Brian R. Reeve*  
8              BRIAN R. REEVE, Esq.  
9              Assistant City Attorney  
10             Nevada Bar No. 10197  
11             240 Water Street  
12             Henderson, NV 89015  
13             brian.reeve@cityofhenderson.com  
14             *Attorneys for Defendants*

14              **IT IS SO ORDERED**

15                
16              UNITED STATES DISTRICT JUDGE

17              DATED: October 13, 2022